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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

July 31, 2019

Mr. Michael Jaramillo, Director
Public Works
Village of Los Lunas
Post Office Box 1209
Los Lunas, New Mexico 87031

**Re: Village of Los Lunas, Major, Individual Permit; SIC 4952; NPDES Compliance Evaluation Inspection;
NPDES Permit No. NM0020303; Inspection Date: July 11, 2019**

Dear Mr. Jaramillo:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long, Enforcement Coordinator
Environmental Protection Agency, Region 6 NPDES
Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Village of Los Lunas

July 31, 2019

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David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Sandra Gabaldón at 505-827-1041 or at Sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb

Program Manager

Point Source Regulation Section

Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
John Rhoderick, NMED District I by e-mail

Craig Byers, Village of Los Lunas by e-mail

SH/sg



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M 0 0 2 0 3 0 3	1 9 0 7 1 1	18 C	19 S	20 1	
M A J O R W W T P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 1 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) VILLAGE OF LOS LUNAS WWTP - 1960 Heaton Loop; Los Lunas, NM 87031 1-25 South, Take Exit 203 to Los Lunas; Turn left (NM6) Main Street; Left at Castillo; then right on Heaton Loop. VALENCIA COUNTY	Entry Time /Date 1020 Hours / July 11, 2019	Permit Effective Date September 1, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Craig Byers, Certified Operator IV, Superintendent	Exit Time/Date 1330 Hours / July 11, 2019	Permit Expiration Date August 31, 2023
Name, Address of Responsible Official/Title/Phone and Fax Number Charles Griego, Mayor Michael Jaramillo, Public Works Director (505) 352-7629 Post Office Box 1209 Los Lunas, New Mexico 87031	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Other Facility Data SIC 4952 - Sector T (Treatment Works) 36°46'49.05 N -106°43'50.06 W

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	S	Self-Monitoring Program	U	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	M	Laboratory	N	Storm Water		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0160	Date July 31, 2019
Signature of Management QA Reviewer Sarah Holcomb, Program Manager	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-2798/(505) 827-0160	Date July 31, 2019

SECTION A – PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

☒ Y ☐ N ☐ NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

☐ Y ☐ N ☒ NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

☒ Y ☐ N ☐ NA

4. ALL DISCHARGES ARE PERMITTED

☒ Y ☐ N ☐ NA

SECTION B – RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

☐ S ☐ M ☒ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

☐ Y ☒ N ☐ NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

☒ S ☐ M ☐ U ☐ NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

☒ Y ☐ N ☐ NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

☒ Y ☐ N ☐ NA

c) ANALYTICAL METHODS AND TECHNIQUES.

☒ Y ☐ N ☐ NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

☒ Y ☐ N ☐ NA

e) DATES AND TIMES OF ANALYSES.

☒ Y ☐ N ☐ NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

☒ Y ☐ N ☐ NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

☒ S ☐ M ☐ U ☐ NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.

☒ S ☐ M ☐ U ☐ NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

☒ Y ☐ N ☐ NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.

☒ S ☐ M ☐ U ☐ NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

☒ S ☐ M ☐ U ☐ NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.

☒ S ☐ M ☐ U ☐ NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

☒ S ☐ M ☐ U ☐ NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE

☒ S ☐ M ☐ U ☐ NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

☒ S ☐ M ☐ U ☐ NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

☒ S ☐ M ☐ U ☐ NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

☒ Y ☐ N ☐ NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

☒ Y ☐ N ☐ NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

☒ Y ☐ N ☐ NA

SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? ☒ Y ☐ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? ☐ Y ☒ N ☐ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? ☒ Y ☐ N ☐ NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? ☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? ☐ Y ☐ N ☒ NA

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO)
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. ☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. ☒ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE ☒ Y ☐ N ☐ NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING. ☒ Y ☐ N ☐ NA
- b) PROPER PRESERVATION TECHNIQUES USED. ☒ Y ☐ N ☐ NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. ☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? ☒ Y ☐ N ☐ NA

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)
DETAILS: Please see further explanations for details.

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ☒ Y ☐ N ☐ NA
TYPE OF DEVICE: 90° V-notch weir
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. ☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. ☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE. ☒ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES. ☒ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. ☒ Y ☐ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. ☒ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION. ☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. ☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☒ M ☐ U ☐ NA (FURTHER EXPLANATION ATTACHED NO)
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) ☒ Y ☐ N ☐ NA

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME. Not all pollutants are sampled in duplicate. ☐ Y ☒ N ☐ NA6. SPIKED SAMPLES ARE ANALYZED. % OF THE TIME. ☐ Y ☐ N ☒ NA7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NALAB NAME Hall Environmental Analysis Laboratory Cove Environmental, LLCLAB ADDRESS 4901 Hawkins, NE; Albuquerque, NM 87109 3400 W Lakeview Rd, Stillwater, OK 74075PARAMETERS PERFORMED Influent/Effluent BOD, TSS; Chloride Biomonitoring, Total Nitrogen, Total PhosphorusSECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☐ U ☒ NA (FURTHER EXPLANATION ATTACHED No)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001							

RECEIVING WATER OBSERVATIONS Outfall pipe was under water during this inspection due to Spring runoff.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA (FURTHER EXPLANATION ATTACHED YES)
DETAILS:1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☒ U ☐ NA3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: Land Application Site (No Public Contact) (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED)1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB COMPOSITE SAMPLE METHOD FREQUENCY 3. SAMPLES PRESERVED. ☐ Y ☐ N ☐ NA4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☐ NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☐ NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☐ NA7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☐ NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☐ NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☐ NA

**LOS LUNAS WASTEWATER TREATMENT PLANT
COMPLIANCE EVALUATION INSPECTION
DATE OF INSPECTION: JULY 11, 2019**

INTRODUCTION:

A compliance evaluation inspection (CEI) was conducted at the Village of Los Lunas Wastewater Treatment Plant (WWTP) on July 11, 2019, by Sandra Gabaldón and Daniel Valenta of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a Publicly Owned Treatment Works (POTW) classified under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned NPDES permit number NM0020303. The facility design flow is 2.7 million gallons a day (MGD).

The Village of Los Lunas WWTP discharges into the Rio Grande in segment 20.6.4.105 (*NMAC State of New Mexico Standards for Interstate and Intrastate Surface Waters*). Designated uses of Segment 20.6.4.105 are irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

The NMED performs a certain number of CEI's annually for the United States Environment Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representative, observations made by the NMED inspector, and a review of records maintained by the permittee, commercial laboratory, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3.

The inspectors arrived at the facility at 1020 hours and conducted an entrance interview with the on-site supervisor, Mr. Craig Byers. Sandra Gabaldon, lead inspector, showed her credentials to Mr. Byers and proceeded with the inspection.

TREATMENT SCHEME:

The Village of Los Lunas WWTP serves a population of approximately 15,454.

The Village of Los Lunas WWTP is a combination of two liquid stream treatment processes with a combined sludge treatment and disposal process. The first liquid stream treatment is a conventional activated sludge process which was first put into service in 1981 and was designed for 1.2 million gallons a day (MGD). Due to change in discharge permit requirements, the facility was de-rated to 0.8 MGD. The second liquid stream treatment process is a membrane bioreactor (MBR) facility that is configured for biological nitrogen removal using a process configured similar to the Modified Ludzack-Ettinger configuration. The MBR was put into service in 2009 and has a design capacity of 0.9 MGD. In 2015, the MBR was upgraded with additional membrane cassettes that doubled the capacity to 1.8 MGD. The current total design flow for the entire WWTP is approximately 2.7 MGD. The plant currently treats approximately 1.6 MGD.

Raw sewage is received through an 18-inch gravity line into the influent lift station. Plant drain flows from several nearby facilities and treatment structures, and a bypass line from the MBR plant are also plumbed to the influent line. The wastewater is then pumped to the entrance works or it can be routed to the MBR entrance works for preliminary treatment. The conventional activated sludge plant entrance works consists of coarse screening via a mechanical rake bar screen where grit is removed by an aerated grit chamber.

The conventional activated treatment process consists of two identical trains that are divided into two zones per train. Both zones are aerated by single drop tube style aeration devices. Oxidized wastewater then enters the secondary clarifiers which are followed by UV disinfection. The effluent is pumped to a mixing box where it is blended with treated effluent from the MBR plant prior to discharge.

IMPROVEMENTS AT THE FACILITY:

The Village of Los Lunas will construct a new 24" effluent discharge pipe that will be parallel to the existing discharge pipe. The construction of the new line will be funded by US EPA's Clean Water State Revolving Loan Fund program. The effluent will be split between the two pipes but will remain one outfall, #001.

The Village is also working on construction of a new Sludge facility on-site. This will be completed in Fall of 2019. On the date of this inspection, the Village of Los Lunas ***DID NOT*** have Construction General Permit Coverage. However, they did file their NOI and will be assigned permit number NMR10029Z. It is unclear if the Village has a SWPPP (Stormwater Pollution Prevention Plan), which is required prior to submittal of the Notice of Intent. The SWPPP on site covers the General Contractor RMCI, NM001001DV.

SLUDGE MANAGEMENT

Sludge is thickened on a gravity belt thickener and then pumped to an aerobic digester. Final sludge disposal is land application.

**Compliance Evaluation Inspection
Los Lunas Wastewater Treatment Plant
NPDES Permit No. NM0020303
Inspection Date:**

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA inspection checklist (Form 3560-3), rather than being ranked in order of importance.

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of “Marginal”

Part IV, Major Sewage Sludge, and 40 CFR 503.17 requires:

(a) Sewage sludge

(1) *The person who prepares the sewage sludge shall develop the following information and shall retain the information for **five years**:*

(i) *The concentration of each pollutant listed in Table 3 of § 503.13 in the sewage sludge.*

Part I, Section D. Overflow Reporting requires:

The permittee shall report all overflows with the DMR submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary). Notification shall be made to EPA at the following email address: <R6_NPDES_Reporting@EPA.gov, as soon as possible, but within 24-hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger the health or the environment shall be provided to EPA and the New Mexico Environment Department within 5 days of the time the permittee becomes aware of the circumstance.

Part I, Section E. Pollution Prevention Requirements state:

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:

- a. The influent loadings, flow and design capacity;*
- b. The effluent quality and plant performance;*
- c. The age and expected life of the wastewater treatment facility's equipment;*
- d. Bypasses and overflows of the tributary sewerage system and treatment works;*
- e. New developments at the facility;*
- f. Operator certification and training plans and status;*
- g. The financial status of the facility;*

- h. Preventive Maintenance programs and equipment conditions, and
- i. An overall evaluation of conditions of the facility.

Discharge Monitoring Reports:

The sample collection and analytical results required by the permit must be reported to EPA through the submission of electronic Discharge Monitoring Reports (DMRs). The data from the DMRs is entered into a national database and is available to the public. It is important that the permittee provide accurate information on their DMRs to ensure their compliance status on the database.

Findings for Recordkeeping and Reporting:

Federal Regulations contained in 40 CFR Part 503 are self-implementing. Compliance is required regardless of whether a permit contains conditions concerning sludge or not. The Village of Los Lunas has a design capacity greater than one MGD. Because of the design capacity, the permittee is required to submit discharge monitoring reports to EPA every year on February 19 as specified in Part IV of the NPDES permit. The permittee has not submitted any of their annual discharge monitoring reports to EPA.

The permittee did not have their Pollution Prevention Plan available on the date of this inspection. The permittee provided a Preliminary Engineering Report from Moltzen-Corbin dated 2013, through email after the inspection. The facility is working on updating the PER to include all the requirements of the Pollution Prevention Plan, Part I, Section E.

The permittee has not reported any sanitary sewer overflows (SSOs) that have occurred outside of the plant. The Village of Los Lunas has a separate department that deals with overflows. The inspector contacted the Village of Los Lunas Water Department to determine if any SSOs had occurred. On May 15, 2019 there was an SSO. There is no communication between the two departments to ensure that the SSOs are reported to EPA and NMED as required under Part I, Section D. The Village of Los Lunas WWTP has been made aware that it is their responsibility to notify both EPA and NMED for SSOs that occur within the Village.

The permittee is reporting zero (0) on their discharge monitoring report for Total Suspended Solids (TSS). However, the bench sheets state Non-detect (ND) and the Practical Quantitative Limit (PQL) is 4. The permittee should be reporting less than 4 not zero. Because the reported "zero" on the DMRs, the mass loading and concentration limits are incorrect.

The permittee should report any qualifiers provided by the contract laboratory, Hall Environmental. On December 6 and December 13, 2018, the laboratory had a DO blank depletion greater than 2.0 mg/L on their BOD samples. This could be a result of dirty glassware or other issues within the laboratory. The permittee did not report the DO blank depletion greater than 2.0 mg/L. This can be reported on the "comment" section of the DMR.

Section C – Operation and Maintenance – Overall Rating "Satisfactory"

NMAC 20.7.4.20 General Certification:

CERTIFICATION GENERAL PROVISIONS:

It is unlawful to operate or allow the operation of a public water supply system or public wastewater facility unless the system or facility is operated by or under the supervision of a certified operator who is of certification required to operate the system or facility.

Findings for Operation and Maintenance:

On the date of the inspection, the Utility Operator Certification Program (UOPC) asked us to determine if the facility was following the requirements of the Certification General Provisions of their regulations. The UOCP questioned if the certified operator was on site during sludge dewatering and removal. When the inspector questioned Mr. Byers, he stated that a non-certified operator was wasting during the weekends. He further stated that the regulations allow him to be offsite but within an hour (driving time) of the facility. Mr. Byers was told this was incorrect and that a certified operator was required to be onsite for all treatment processes. Mr. Byers contacted the UOCP and was told the same. Mr. Byers stated that certified operators will now be onsite for any processes, including sludge wasting and dewatering.

Section E – Flow Measurement – Overall Rating of “Marginal”

The permit requires in Part III, Section C.6:

Flow Measurements:

Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of volume of monitored discharges. The devices shall be installed, calibrated, and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a minimum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

Findings for Flow Measurement:

The permittee provided flow calibration checks. On July 17, 2019, the permittee did a check of the totalizer and the staff gauge. The staff gauge reading was 0.95 and the totalizer meter was 1.10. In doing a calibration check to ensure it is within the 10% minimum deviation from true discharge rates is as follows:

Primary Measuring device: 90° V-Notch Weir
Secondary Measuring device: Ultrasonic totalizer meter

Calculation: $(\text{Secondary flow reading} - \text{primary flow reading} \times 100) / \text{Primary flow reading}$

$$1.10 - .95 = .15 \times 100 = 15 / .95 = .16$$

16% is greater than 10% minimum deviation from true discharge rates.

BOD EFFLUENT LOADING CALCULATION:
(MGD X CONCENTRATION (mg/L) X 8.34 = lbs/d)

Sample Date:	Daily Flow	BOD (mg/l)	Calculated Daily Load
12/06/2018	1.21 MGD	3.0	1.21 MGD X 3.0 X 8.34 = 30.27
12/13/2018	1.24 MGD	8.0	1.24 MGD X 8.0 X 8.34 = 82.73
12/20/2018	1.27 MGD	3.0	1.27 MGD X 3.0 X 8.34 = 31.78
12/27/2018	1.17 MGD	4.0	1.17 MGD X 4.0 X 8.34 = 39.03
Monthly Loading Average:	30.27 + 82.73 + 31.78 + 39.03 = 183.81 / 4 = 45.95 lbs/D		
Reported on DMR	34.88 lbs/D		
7-Day Average:	82.73 lbs/D		
30-Day Average:	45.95 lbs/D		
Concentration:	Reported on DMR:		
7-day Average:	8.0 mg/L		
30-day Average:	3.0 + 8.0 + 3.0 + 4.0 = 18/ 4 = 4.5 mg/L		

TSS EFFLUENT LOADING CALCULATION:

Sample Date:	Daily Flow (MGD)	TSS (mg/l)	Calculated Daily Load
12/6/2018	1.21 MGD	<4.0	1.21 MGD X <4.0 X 8.34 = <40.37
12/13/2018	1.24 MGD	<4.0	1.24 MGD X <4.0 X 8.34 = <41.37
12/20/2018	1.27 MGD	<4.0	1.27 MGD X <4.0 X 8.34 = <42.37
12/27/2018	1.17 MGD	<4.0	1.17 MGD X <4.0 X 8.34 = <39.03
Monthly Loading Average:	40.37 + 41.37 + 42.37 + 39.03 = <40.79		
Reported on DMR	0 lbs/D		
7-Day Average:	0 lbs/D		
30-Day Average:	0 lbs/D		
Concentration:			
Reported on DMR:	0 mg/L		
7-Day Average:	<4.0 mg/L		
30-D Average:	<4.0 mg/L		

BOD INFLUENT/EFFLUENT PERCENT REMOVAL CALCULATION:

(average monthly influent concentration – average monthly effluent concentration) / average monthly influent concentration)

Sample Date:	Daily Flow (MGD)	BOD influent (mg/l)	BOD effluent (mg/l)
12/06/2018	1.21	260	3.0
12/13/2018	1.24	350	8.0
12/20/2019	1.27	260	3.0
12/27/2018	1.17	310	4.0
PERCENT REMOVAL:	$295 - 4.5 / 295 = .98$		
Reported on DMR	98%		

TSS INFLUENT CALCULATION:

Sample Date:	Daily Flow (MGD)	TSS influent(mg/l)	TSS effluent (mg/l)
12/06/2018	1.21	91	<4.0
12/13/2018	1.24	240	<4.0
12/20/2018	1.27	190	<4.0
12/27/2018	1.17	210	<4.0
PERCENT REMOVAL:	$182.75 - <4.0 / 182.75 = .97$		
Reported on DMR	100%		

E.Coli Calculation Check - Concentration

Sample Date:	Colonies / 100 ml	Antilog
12/03/2018	65.0	1.81
12/11/2018	45.0	1.65
12/18/2018	24.1	1.38
12/25/2018	27.5	1.4
Arithmetic Average:	$1.81 + 1.65 + 1.38 + 1.44 / 4 = 1.57$	
Geometric Mean:	Antilog of 1.57 = 37.15	
Reported 30-d Geomean:	40.4	

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: July 11, 2019	Time: 1205 Hours
City/County: Village of Los Lunas/Valencia		State: New Mexico
Location: Village of Los Lunas WWTP		
Subject: Overview of WWTP		

